

EXHIBIT 4

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

As relates to: 03 MDL 1570 (GBD) (SN)

LAURENCE SCHLISSEL, JUDE LASPA, BRUCE
SEELIGER, MANSURA SHAJAHAN,
CHRISTOPHER DAVISON, FRANCIS SHEA,
KATHLEEN SHEA, THOMAS J. SHEA,
THOMAS J. SHEA, FRANCIS SHEA,
KATHLEEN SHEA, ELOISE CLARKE, JOHN
SIGMUND, KENNETH SIKORSKY, STANLEY
SIMON, MARILYN SMITH PUSEY, JAMES
SMITH, CATHERINE RICCIARDELLI,
MICHAEL SPAMPINATO, LINDA E.
SPAMPINATO, KRISTINA SPENCE, SHANNON
SPENCE, DOROTHY MULLIS, DAVID
CARROLL, TORRASS STEPHENS, TRUDY
STOLLER, MELANIE STRAUSS, DEREK
STRAUSS, JEAN STRAUSS, JILL MARSELLA,
PALLAVI SHIROLKAR, KATHLEEN
THOMPSON, DOREEN THOMPSON, BEATRICE
WOLLEN, SAUNDRA WOLLEN, TERESA
TRAINA, THERESA CORIO, ANN VAN HINE,
VASANTA VELAMURI, RAMON VELAZQUEZ,
CARMEN GUZMAN, MIGDALIA LOPEZ,
CLOTILDA VOLA, KIM WAGNER, ANDREA
TREBLE, REBECCA WALD CLEMENTO,
ROBERT WALLACE, SUSAN WATSON, ENID
WHITE, WAKELAND HIGGINS, CONNIE
MURRAY, HILDA VENTURA, KATHLEEN
WIK, THOMAS C. WIK, RAPHAEL WIK, EDDIE
WONG, SHARIF CHOWDHURY, WILLIAM
YOUNG, MARVENE YOUNG, MICHAEL
ZAMPIERI, JEANNIE SCHLESINGER, JACK
ZELMANOWITZ,

PLAINTIFFS,

V.

ISLAMIC REPUBLIC OF IRAN,

DEFENDANT.

Civil Docket Number: _____

**SHORT FORM COMPLAINT AND
DEMAND FOR TRIAL BY JURY**

ECF CASE

IRAN SHORT FORM COMPLAINT

Plaintiffs file this Short Form Complaint against Defendant Islamic Republic of Iran (“Iran”) arising out of the September 11, 2001 terrorist attacks (“September 11, 2001 Terrorist Attacks”) as named herein by and through the undersigned counsel.

Plaintiffs incorporate by reference the specific allegations, as indicated below, of the *Burnett, et al. v. Islamic Republic of Iran et al.*, Amended Complaint, 15-cv-9903 (S.D.N.Y.) (GBD) (SN) Doc. No. 53 (hereinafter the “*Burnett Iran Complaint*”).

Plaintiffs files this *Iran Short Form Complaint* as permitted and approved by the Court’s Order of May 25, 2018, 2018, ECF No. 4010 in 1:03-md-01570-GBD-SN.

Upon filing of this *Iran Short Form Complaint*, Plaintiffs are deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, Plaintiffs incorporate the factual allegations and findings contained in those pleadings and orders filed, *inter alia*, at *Havlish v. Bin Laden*, Docket No. 1:03-cv-9848, ECF Nos. 263, 294, 295 (S.D.N.Y Dec. 22, 2011); *Havlish v. Bin Laden*, 03 MDL 1570, ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before Hon. George B. Daniels on December 15, 2011 (ECF No. 2540).

This *Iran Short Form Complaint* relates solely to Defendant Iran, and does not apply to any other defendant.

VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

JURISDICTION

2. Jurisdiction against Iran is premised on the grounds set forth in the complaints specified below, including but not limited to 28 U.S.C. § 1605(a) (tort exception to the Foreign Sovereign Immunities Act), 28 U.S.C. § 1605A (terrorism exception to the Foreign Sovereign Immunities Act) and 28 U.S.C. § 1605B (Justice Against Sponsors of Terrorism Act).

CAUSES OF ACTION

3. Plaintiffs hereby adopts and incorporates by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ *Ashton* Iran Complaint, Docket Number 02-cv-6977 (S.D.N.Y.) (GBD)(SN) (03-md-1570 ECF Doc. No. 3237)
- ☒ *Burnett* Iran Complaint, Docket Number 15-cv-9903 (S.D.N.Y.) (GBD)(SN) (ECF Doc. No. 53)

4. In addition, Plaintiffs hereby assert the following additional causes of action:

- ☒ *Iran Short Form Complaint* First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiffs allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the *Havlish* filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

- ☐ *Iran Short Form Complaint* First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the *Havlish* filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

5. Plaintiffs are making such claim on the following basis, and incorporates by reference that supplemental information provided on Appendix 1 to the *Iran Short Form Complaint*, identifying the Plaintiffs asserted basis for participating in this suit:

- X Estate Wrongful Death Claim by Estate Representative on Behalf of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks

- ☒ Solatium Claim by Immediate Family Member of an Individual Killed as a result of the September 11, 2001 Terrorist Attacks
- ☐ Personal Injury Claim by Individual Injured as a result of the September 11, 2001 Terrorist Attacks

IDENTIFICATION OF PLAINTIFFS

6. The following allegations and information are alleged on behalf of each individual who is bringing this claim, as indicated on Appendix 1 to this *Iran Short Form Complaint*, herein referred to as "Plaintiffs."

- a. The citizenship/nationality of each Plaintiff is indicated at Appendix 1 to this *Iran Short Form Complaint*.
- b. Plaintiff is entitled to recover damages on the causes of action set forth in the complaint identified above, as joined by this *Iran Short Form Complaint*, and as further asserted within this *Iran Short Form Complaint*.
- c. As indicated at Appendix 1, Plaintiff (i) is the estate representative of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; (ii) is the surviving immediate family member of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; and/or (iii) suffered physical injuries as a result of the September 11, 2001 Terrorist Attacks.
- d. For those plaintiffs with personal injury claims, as indicated in Appendix 1, related to the September 11, 2001 Terrorist Attacks, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged, as stated specifically in Appendix 1.
- e. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant's actions or inactions, Plaintiff or his or her decedent suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the *Iran Short Form Complaint*, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.
- f. The name, relationship to the injured and/or deceased September 11 victim, residency, citizenship/nationality, and the general nature of the

claim for each plaintiff asserting wrongful death and/or personal injury claims is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the related complaints, as specified above, deemed alleged as to each plaintiff.

IDENTIFICATION OF THE DEFENDANT

7. The only Defendant named in this *Short Form Complaint* is the Islamic Republic of Iran.

NO WAIVER OF OTHER CLAIMS

8. By filing this *Short Form Complaint*, Plaintiffs are not waiving any right to file suit against any other potential defendants or parties.

9. By filing this *Iran Short Form Complaint*, Plaintiffs are not opting out of any class that the Court may certify in the future.

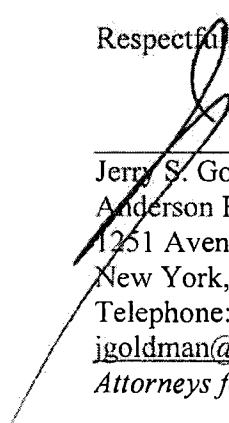
WHEREFORE, Plaintiffs prays for relief and judgment against Defendant as set forth in the *Burnett Iran Complaint*, as indicated above.

JURY DEMAND

Plaintiffs hereby demands a trial by jury as to the claims in this action.

Dated: June 12, 2018

Respectfully submitted,



Jerry S. Goldman
Anderson Kill P.C.
1251 Avenue of the Americas
New York, New York
Telephone: 212-278-1000
jgoldman@andersonkill.com
Attorneys for Plaintiffs

See Appendix 1 Annexed

APPENDIX 1 TO THE IRAN SHORT FORM COMPLAINT

Each line below is deemed an allegation, incorporating the allegations, language and references within the *Burnett* Amended Complaint as noted in the Iran Short Form Complaint to which this Appendix is appended. All allegations below shall be referenced as Allegation 1 of Appendix 1 to Iran Short Form Complaint, Allegation 2 of Appendix 1 to the Iran Short Form Complaint, etc.

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
1	Schlissel, Laurence	NJ	Schlissel, Jon S.	Brother/PR	United States	United States	Solatium/ Wrongful Death
2	Laspa, Jude	TX	Schuler, Susan Lee	Brother/PR	United States	United States	Solatium/ Wrongful Death
3	Seeliger, Bruce	CT	Seeliger, Margaret	Spouse	United States	United States	Solatium
4	Shajahan, Mansura	FL	Shajahan, Mohammed	Spouse/PR	United States	United States	Solatium/ Wrongful Death
5	Davison, Christopher	NY	Shatzoff, Kathryn A.	Brother	United States	United States	Solatium
6	Shea, Francis	NY	Shea, Daniel	Brother	United States	United States	Solatium
7	Shea, Kathleen	WA	Shea, Daniel	Sister	United States	United States	Solatium
8	Shea, Thomas J.	NJ	Shea, Daniel	Brother	United States	United States	Solatium
9	Shea, Thomas J.	NJ	Shea, Joseph	Brother	United States	United States	Solatium
10	Shea, Francis	NY	Shea, Joseph	Brother	United States	United States	Solatium
11	Shea, Kathleen	WA	Shea, Joseph	Sister	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
12	Clarke, Eloise	MD	Sherman, Antoinette	Mother/PR	United States	United States	Solatium/ Wrongful Death
13	Sigmund, John	PA	Sigmund, Johanna	Brother	United States	United States	Solatium
14	Sikorsky, Kenneth	NY	Sikorsky, Gregory	Brother	United States	United States	Solatium
15	Simon, Stanley	NY	Simon, Arthur	Brother/PR	United States	United States	Solatium/ Wrongful Death
16	Smith Pusey, Marilyn	NC	Smith, Leon	Spouse/PR	United States	United States	Solatium/ Wrongful Death
17	Smith, James	NY	Smith, Moira A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
18	Ricciardelli, Catherine	NJ	Sorresse, Michael C.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
19	Spampinato, Michael	MI	Spampinato, Donald F.	Brother	United States	United States	Solatium
20	Spampinato, Linda E.	NC	Spampinato, Donald F.	Sister	United States	United States	Solatium
21	Spence, Kristina	FL	Spence, Maynard S.	Daughter	United States	United States	Solatium
22	Spence, Shannon	FL	Spence, Maynard S.	Daughter	United States	United States	Solatium
23	Mullis, Dorothy	NC	Spence, Maynard S.	Sister	United States	United States	Solatium
24	Carroll, David	MD	Statz, Patricia J.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
25	Stephens, Torrass	GA	Stephens, Edna L.	Son/PR	United States	United States	Solatium/ Wrongful Death

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
26	Stoller, Trudy	NY	Stoller, Stanford M.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
27	Strauss, Melanie	NY	Strauss, Steven	Daughter	United States	United States	Solatium
28	Strauss, Derek	NY	Strauss, Steven	Son	United States	United States	Solatium
29	Strauss, Jean	NY	Strauss, Steven	Spouse	United States	United States	Solatium
30	Marsella, Jill	NJ	Swift, Thomas F.	Spouse	United States	United States	Solatium
31	Shirolkar, Pallavi	NC	Thatte, Harshad S.	Spouse/PR	India	India	Solatium/ Wrongful Death
32	Thompson, Kathleen	NY	Thompson, Brian T.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
33	Thompson, Doreen	NY	Thompson, Vanavah	Mother/PR	United States	Guyana	Solatium/ Wrongful Death
34	Wollen, Beatrice	GA	Thurman, Tamara	Sister	United States	United States	Solatium
35	Wollen, Saundra	GA	Thurman, Tamara	Mother	United States	United States	Solatium
36	Traina, Teresa	FL	Traina, Christopher M.	Mother/PR	United States	United States	Solatium/ Wrongful Death
37	Corio, Theresa	NY	Urban, Diane M.	Sister/PR	United States	United States	Solatium/ Wrongful Death
38	Van Hine, Ann	NY	Van Hine, Richard B.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
39	Velamuri, Vasanta	NJ	Velamuri, Sankara	Spouse	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
40	Velazquez, Ramon	NJ	Velazquez, Jorge L.	Son	United States	United States	Solatium
41	Guzman, Carmen	NY	Vera, David	Mother	United States	United States	Solatium
42	Lopez, Migdalia	NY	Vera, David	Sister	United States	United States	Solatium
43	Vola, Clotilda	NY	Vola, Maria P.	Sister/PR	United States	United States	Solatium/ Wrongful Death
44	Wagner, Kim	TX	Wagner, Karen J.	Sister/PR	United States	United States	Solatium/ Wrongful Death
45	Treble, Andrea	NY	Waisman, Gabriela	Sister/PR	United States	United States	Solatium/ Wrongful Death
46	Wald Clemento, Rebecca	PA	Wald, Victor	Spouse/PR	United States	United States	Solatium/ Wrongful Death
47	Wallace, Robert	NY	Wallace, Robert F.	Son	United States	United States	Solatium
48	Watson, Susan	NY	Watson, Kenneth	Spouse/PR	United States	United States	Solatium/ Wrongful Death
49	White, Enid	FL	White, John	Spouse/PR	United States	United States	Solatium/ Wrongful Death
50	Higgins, Wakeland	FL	White, Malissa	Spouse/PR	United States	United States	Solatium/ Wrongful Death
51	Murray, Connie	MD	White, Sandra L.	Sister	United States	United States	Solatium
52	Ventura, Hilda	NY	White, Wayne	Sister	United States	United States	Solatium
53	Wik, Kathleen	NY	Wik, William	Sister	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
54	Wik, Thomas C.	NY	Wik, William	Brother	United States	United States	Solatium
55	Wik, Raphael	FL	Wik, William	Brother	United States	United States	Solatium
56	Wong, Eddie	NY	Wong, Yuk Ping	Son/PR	United States	United States	Solatium/ Wrongful Death
57	Chowdhury, Sharif	Dhaka, Bangladesh	Yasmin, Shakila	Father/PR	United States	United States	Solatium/ Wrongful Death
58	Youmans, William	FL	Youmans, Suzanne	Brother/PR	United States	United States	Solatium/ Wrongful Death
59	Young, Marvene	MD	Young, Edmond G. Jr.	Brother/PR	United States	United States	Solatium/ Wrongful Death
60	Zampieri, Michael	NJ	Zampieri, Robert A.	Brother	United States	United States	Solatium
61	Schlesinger, Jeannie	NJ	Zampieri, Robert A.	Sister	United States	United States	Solatium
62	Zelmanowitz, Jack	NY	Zelmanowitz, Abraham	Brother/PR	United States	United States	Solatium/ Wrongful Death

28 USC 1608 Summons IH 6

4/17

UNITED STATES DISTRICT COURT

for the

Southern District of New York

LAURENCE SCHLISSEL, ET AL. (see
appendix)

Plaintiff

v.

ISLAMIC REPUBLIC OF IRAN

Defendant

)
)
)
)
)
)
)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address) ISLAMIC REPUBLIC OF IRAN,
c/o Permanent Mission of Iran
to the United Nations
622 Third Avenue
New York, NY 10017

A lawsuit has been filed against you.

Within 60 days after service of this summons on you (not counting the day you received it) you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jerry S. Goldman, Esq.
ANDERSON KILL P.C.
1251 Avenue of the Americas
New York, NY 10020
(212) 278-1000
jgoldman@andersonkill.com

If you fail to respond, judgment by default may be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

28 USC 1608 Summons (12/11) (Page 2)

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____.

▫ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____; or

▫ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

▫ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____; or

▫ I returned the summons unexecuted because _____; or

▫ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

APPENDIX

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
1	Schlissel, Laurence	NJ	Schlissel, Jon S.	Brother/PR	United States	United States	Solatium/ Wrongful Death
2	Laspa, Jude	TX	Schuler, Susan Lee	Brother/PR	United States	United States	Solatium/ Wrongful Death
3	Seeliger, Bruce	CT	Seeliger, Margaret	Spouse	United States	United States	Solatium
4	Shajahan, Mansura	FL	Shajahan, Mohammed	Spouse/PR	United States	United States	Solatium/ Wrongful Death
5	Davison, Christopher	NY	Shatzoff, Kathryn A.	Brother	United States	United States	Solatium
6	Shea, Francis	NY	Shea, Daniel	Brother	United States	United States	Solatium
7	Shea, Kathleen	WA	Shea, Daniel	Sister	United States	United States	Solatium
8	Shea, Thomas J.	NJ	Shea, Daniel	Brother	United States	United States	Solatium
9	Shea, Thomas J.	NJ	Shea, Joseph	Brother	United States	United States	Solatium
10	Shea, Francis	NY	Shea, Joseph	Brother	United States	United States	Solatium
11	Shea, Kathleen	WA	Shea, Joseph	Sister	United States	United States	Solatium
12	Clarke, Eloise	MD	Sherman, Antoinette	Mother/PR	United States	United States	Solatium/ Wrongful Death
13	Sigmund, John	PA	Sigmund, Johanna	Brother	United States	United States	Solatium
14	Sikorsky, Kenneth	NY	Sikorsky, Gregory	Brother	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
15	Simon, Stanley	NY	Simon, Arthur	Brother/PR	United States	United States	Solatium/ Wrongful Death
16	Smith Pusey, Marilyn	NC	Smith, Leon	Spouse/PR	United States	United States	Solatium/ Wrongful Death
17	Smith, James	NY	Smith, Moira A.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
18	Ricciardelli, Catherine	NJ	Sorresse, Michael C.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
19	Spampinato, Michael	MI	Spampinato, Donald F.	Brother	United States	United States	Solatium
20	Spampinato, Linda E.	NC	Spampinato, Donald F.	Sister	United States	United States	Solatium
21	Spence, Kristina	FL	Spence, Maynard S.	Daughter	United States	United States	Solatium
22	Spence, Shannon	FL	Spence, Maynard S.	Daughter	United States	United States	Solatium
23	Mullis, Dorothy	NC	Spence, Maynard S.	Sister	United States	United States	Solatium
24	Carroll, David	MD	Statz, Patricia J.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
25	Stephens, Torrass	GA	Stephens, Edna L.	Son/PR	United States	United States	Solatium/ Wrongful Death
26	Stoller, Trudy	NY	Stoller, Stanford M.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
27	Strauss, Melanie	NY	Strauss, Steven	Daughter	United States	United States	Solatium
28	Strauss, Derek	NY	Strauss, Steven	Son	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
29	Strauss, Jean	NY	Strauss, Steven	Spouse	United States	United States	Solatium
30	Marsella, Jill	NJ	Swift, Thomas F.	Spouse	United States	United States	Solatium
31	Shirolkar, Pallavi	NC	Thatte, Harshad S.	Spouse/PR	India	India	Solatium/ Wrongful Death
32	Thompson, Kathleen	NY	Thompson, Brian T.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
33	Thompson, Doreen	NY	Thompson, Vanavah	Mother/PR	United States	Guyana	Solatium/ Wrongful Death
34	Wollen, Beatrice	GA	Thurman, Tamara	Sister	United States	United States	Solatium
35	Wollen, Saundra	GA	Thurman, Tamara	Mother	United States	United States	Solatium
36	Traina, Teresa	FL	Traina, Christopher M.	Mother/PR	United States	United States	Solatium/ Wrongful Death
37	Corio, Theresa	NY	Urban, Diane M.	Sister/PR	United States	United States	Solatium/ Wrongful Death
38	Van Hine, Ann	NY	Van Hine, Richard B.	Spouse/PR	United States	United States	Solatium/ Wrongful Death
39	Velamuri, Vasanta	NJ	Velamuri, Sankara	Spouse	United States	United States	Solatium
40	Velazquez, Ramon	NJ	Velazquez, Jorge L.	Son	United States	United States	Solatium
41	Guzman, Carmen	NY	Vera, David	Mother	United States	United States	Solatium
42	Lopez, Migdalia	NY	Vera, David	Sister	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
43	Vola, Clotilda	NY	Vola, Maria P.	Sister/PR	United States	United States	Solatium/ Wrongful Death
44	Wagner, Kim	TX	Wagner, Karen J.	Sister/PR	United States	United States	Solatium/ Wrongful Death
45	Treble, Andrea	NY	Waisman, Gabriela	Sister/PR	United States	United States	Solatium/ Wrongful Death
46	Wald Clemento, Rebecca	PA	Wald, Victor	Spouse/PR	United States	United States	Solatium/ Wrongful Death
47	Wallace, Robert	NY	Wallace, Robert F.	Son	United States	United States	Solatium
48	Watson, Susan	NY	Watson, Kenneth	Spouse/PR	United States	United States	Solatium/ Wrongful Death
49	White, Enid	FL	White, John	Spouse/PR	United States	United States	Solatium/ Wrongful Death
50	Higgins, Wakeland	FL	White, Malissa	Spouse/PR	United States	United States	Solatium/ Wrongful Death
51	Murray, Connie	MD	White, Sandra L.	Sister	United States	United States	Solatium
52	Ventura, Hilda	NY	White, Wayne	Sister	United States	United States	Solatium
53	Wik, Kathleen	NY	Wik, William	Sister	United States	United States	Solatium
54	Wik, Thomas C.	NY	Wik, William	Brother	United States	United States	Solatium
55	Wik, Raphael	FL	Wik, William	Brother	United States	United States	Solatium

	Plaintiff's Last Name, First Name	Plaintiff's State of Residency at Filing	Last Name, First Name of 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Relationship to 9/11 Decedent (wrongful death and solatium cases)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Citizenship/ Nationality on 9/11/01 (wrongful death and solatium cases)	Nature of Claim (wrongful death, solatium, personal injury)
56	Wong, Eddie	NY	Wong, Yuk Ping	Son/PR	United States	United States	Solatium/ Wrongful Death
57	Chowdhury, Sharif	Dhaka, Bangladesh	Yasmin, Shakila	Father/PR	United States	United States	Solatium/ Wrongful Death
58	Youmans, William	FL	Youmans, Suzanne	Brother/PR	United States	United States	Solatium/ Wrongful Death
59	Young, Marvene	MD	Young, Edmond G. Jr.	Brother/PR	United States	United States	Solatium/ Wrongful Death
60	Zampieri, Michael	NJ	Zampieri, Robert A.	Brother	United States	United States	Solatium
61	Schlesinger, Jeannie	NJ	Zampieri, Robert A.	Sister	United States	United States	Solatium
62	Zelmanowitz, Jack	NY	Zelmanowitz, Abraham	Brother/PR	United States	United States	Solatium/ Wrongful Death

IH-32

Rev: 2014-1

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Laurence Schlissel, et al.

Plaintiff vs. Islamic Republic of Iran	Case Number 1:18-cv-05331
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

In re Terrorist Attacks on September 11,
2001

Plaintiff vs.	Case Number 03 MDL 1570 (GBD)(SN)
Defendant	

IH-32

Rev: 2014-1

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

☒

Open

(If so, set forth procedural status and summarize any court rulings.)

Partial and/or full summary judgment as to Defendant Islamic Republic of Iran has been granted and ordered for select plaintiffs. This matter is still ongoing. On May 25, 2018, the Court entered an Order approving the "Iran Short Form Complaint" that is filed herewith. (See ECF No. 4010 in 1:03-md-01570-GBD-SN).

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

This is also a September 11th case for wrongful death that is against the sponsors of terrorism as the Defendant Islamic Republic of Iran is involved in the related MDL action. We are seeking similar relief in the form of damages from the Defendant. The Plaintiffs herein intend to participate in the underlying litigations as to the other defendants in due course. This case is also related to Estate of John Patrick O'Neill Sr., et al. v The Republic of Iraq, et al., 04-1076-GBN-SN; Thomas E. Burnett, Sr., in his own right as the Parent of Thomas E. Burnett, Jr., Deceased, et al. v. The Islamic Republic of Iran, et al., 15-cv-09903-GBN-SN; and Kathleen Ashton et al. v. al Qaeda Islamic Army, et al., 02-cv-06977-GBN-FM. The instant complaint is being filed in accordance with the Court's directive of May 25, 2018, ECF No. 4010 in 1:03-md-01570-GBD-SN.

Signature: _____

Date: June 9, 2018

Jerry S. Goldman, Esq.
Anderson Kill P.C.

Firm: _____